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April 22, 2020

VIA ECF

Hon. Naomi Reice Buchwald
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Helper et al. v. JPMorgan Chase Bank, N.A.*, Case No: 1:19-cv-0008-NRB-OTW

Dear Judge Buchwald:

We represent defendant, JPMorgan Chase Bank, N.A. (“Chase”), in the above-referenced action. We respectfully submit this letter to request permission to file certain exhibits to Chase’s forthcoming Motion for Summary Judgment, pursuant to Fed. R. Civ. P. Rule 56, under seal.

Specifically, Chase seeks to file the following documents under seal: (1) Exhibit “10” to the Declaration of Tyler J. Kandel, Esq. in Support of JPMorgan Chase Bank, N.A.’s Motion for Summary Judgment, which consists of relevant excerpts from the deposition transcript of Chase Safe Deposit Box Analyst, Nancy Scipio, conducted on August 29, 2019; and (2) Exhibit “F” to the Declaration of Tracalene Ruiz in Support of JPMorgan Chase Bank, N.A.’s Motion for Summary Judgment, which consists of Chase’s confidential Policies and Procedures for drilling safe deposit boxes.

Both exhibits contain confidential information relating to Chase’s policies and procedures for the drilling of safe deposit boxes. Chase seeks to protect this information from becoming public knowledge in order to maintain the security of its procedures concerning safe deposit boxes. Accordingly, Chase respectfully requests that the Court issue an Order, permitting the aforementioned Exhibits to be filed under seal. Should the Court wish to review copies of these exhibits before determining whether to seal them, we would be happy to provide the Court with copies of the documents by email.

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Please do not hesitate to contact the undersigned should the Court have any questions.

Respectfully Submitted,

/s/ Tyler J. Kandel

Tyler J. Kandel

cc: Joseph Sullivan, Esq.
Via ECF and email

Application granted.

Dated: April 22, 2020



NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE